

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

3 David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

4 Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

5 John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

6 Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

7 50 California Street, 22nd Floor

San Francisco, California 94111-4788

8 Telephone: (415) 875-6600

9 Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;

16 OTTOMOTTO LLC; OTTO TRUCKING

17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR OPPOSITION TO
WAYMO'S MOTION TO COMPEL UBER
SOURCE CODE**

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Uber Technologies, Inc. and
7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Opposition to Waymo’s Motion to
8 Compel Uber Source Code (the “Administrative Motion”). The Administrative Motion seeks an order
9 sealing highlighted portions of Defendants’ Opposition to Waymo’s Motion to Compel (“Uber’s
10 Opposition”), as well as the entirety of Exhibits 1-4, 6A, and 6B thereto.

11 3. The portions of Uber’s Opposition marked in red boxes and the entirety of Exhibits 1-
12 4, 6A, and 6B contain or refer to trade secrets and confidential business information, which Waymo
13 seeks to seal.

14 4. Uber’s Opposition (portions marked in red boxes in version filed herewith) and
15 Exhibits 1-4 (entire documents) contain, reference, and/or describe Waymo’s highly confidential and
16 sensitive business information. The information Waymo seeks to seal regards confidential analysis of
17 Waymo’s business, including details about strategy and potential partnerships. I understand that this
18 confidential business information is maintained by Waymo as secret. The public disclosure of this
19 information would give Waymo’s competitors access to Waymo’s business strategy for its
20 autonomous vehicle system. If such information were made public, I understand that Waymo’s
21 competitive standing would be significantly harmed.

22 5. Uber’s Opposition (portions marked in red boxes in version filed herewith), and
23 Exhibits 2-3, 6A, and 6B (entire documents) contain, reference, and/or describe Waymo’s asserted
24 trade secrets, including as misappropriated by Defendants. The information Waymo seeks to seal
25 includes the confidential design and functionality of Waymo’s proprietary autonomous vehicle
26 system, including its source code, which Waymo maintains as secret. I understand that these trade
27 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to
28 Waymo’s business (Dkt. 25-31). The public disclosure of this information would give Waymo’s

1 competitors access to descriptions of the functionality or features of Waymo's autonomous vehicle
2 system. If such information were made public, I understand that Waymo's competitive standing
3 would be significantly harmed.

4 6. Waymo's request to seal is narrowly tailored to those portions of Uber's Opposition
5 and Exhibits 1-4, 6A, and 6B that merit sealing.

6
7 I declare under penalty of perjury under the laws of the State of California and the United
8 States of America that the foregoing is true and correct, and that this declaration was executed in San
9 Francisco, California, on October 16, 2017.

10 By /s/ Felipe Corredor

11 Felipe Corredor

12 Attorneys for WAYMO LLC

13
14 **ATTESTATION**

15 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
16 document has been obtained from Felipe Corredor.

17
18 By: /s/ Charles K. Verhoeven

19 Charles K. Verhoeven